

PUBLICKER/CUYAHOGA WRECKING PLANT
ADMINISTRATIVE RECORD FILE *
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

1. Report: Preliminary Report, Environmental Evaluation, Former Publicker Industries, Inc., Refinery, Philadelphia, PA, prepared by Dames & Moore, 7/21/86. P. 100001-100006.
2. U.S. EPA Region III Incident Notification Report, Publicker Terminal, 6/26/87. P. 100007-100007.
3. Report: Publicker Industries Site, Philadelphia, PA, Assessment Scope of Work, (no author cited), 7/14/87. P. 100008-100010.
4. Problem Areas List, Publicker Industries Site, Philadelphia, PA, 7/24/87. P. 100011-100011.
5. Report: Final Progress Report for Overland Corporation's Facility in Philadelphia, Pennsylvania, prepared by O.H. Materials Corporation, 11/12/87. P. 100012-100015.
6. Memorandum to Mr. Tom Voltaggio, U.S. EPA, re: Site conditions and possible site visit, 12/1/87. P. 100016-100016.
7. Report: Former Publicker Industries Site Briefing Document, prepared by Mr. David P. Wright, U.S. EPA, 3/88. P. 100017-100019.
8. Background information re: Chemicals manufactured at the Publicker Plant, (no author cited), (undated). P. 100020-100025. The following are attached:
 - a) a monitoring well location map;
 - b) an elevation of shallow groundwater surface location map;
 - c) Table 1, measured water table;
 - d) laboratory analytical data summary of composite soil samples;

* Administrative Record File available 3/9/89, updated 4/28/89 11/6/90, 4/19/95, 5/4/95 and 6/1/95.

- e) laboratory analytical data summary for ground water samples.

* Administrative Record File available 3/9/89, updated 4/28/89 11/6/90, 4/19/95, 5/4/95 and 6/1/95.

II. REMEDIAL ENFORCEMENT PLANNING

1. Chapter 11 Voluntary Petition, 1/6/87. P. 200001-200006. A Corporate Resolution, A Rule 52 Affidavit, and an Order for Retention of Attorneys for Debtor-in-Possession are attached.
2. Order Approving Selection of Trustee, 2/11/87. P. 200007-200009. An Application for Order Approving the United States Trustee's Appointment of a Trustee is attached.
3. Order re: Cuyahoga Equipment Corporation, Philip B. Schwab, Mary L. Schwab, Cuyahoga Wrecking Corporation, a Florida Corporation, Cuyahoga Wrecking Co., Inc., an Illinois Corporation, and Jordon & Foster Scrap Corporation, 2/13/87. P. 200010-200018. Two affidavits and an Order are attached.
4. Stipulation and Order Modifying Stay to Permit Foreclosure of Lien Upon Property of Overland Corporation, 7/7/87. P. 200019-200025.
5. Letter to Mr. Robert Caron, U.S. EPA from Mr. Robert Gellman, Freedom Savings, re: Permitting access to the site, 7/10/87. P. 200026-200027.
6. Order Amending February 13, 1987 Order and Authorizing Trustee to Execute Right Of Access and Release Agreement with Publicker Industries Inc., and Mortgagee, 7/23/87. P. 200028-200054. An Application for Order Amending February 13, 1987 Order and Authorizing Trustee to Execute Right of Access and Release Agreement with Publicker Industries, Inc. and Mortgages is attached.
7. Letter to Mr. Martin Harrell, U.S. EPA, from Mr. Richard A. Penna, Schnader, Harrison, Segal, & Lewis, re: Transmittal of the release agreement and the right of access, 7/31/87. P. 200055-200066. The release agreement and the right of access are attached.
8. Consent Agreement and Order In The Matter Of Cuyahoga Wrecking Site and Publicker Industries, Inc., 8/13/87. P. 200067-200084.

9. Indictment in the United States District Court for the District of Maryland, United States of America v. Cuyahoga Wrecking Corporation, Overland Corporation, Samuel Runfola, Virgil Cummings, and Ernest Ray Martin, 10/21/87. P. 200085-200092.
10. Letter to Mr. Martin Harrell, U.S. EPA, from Mr. Richard A. Penna, Schnader, Harrison, Segal, & Lewis, re: Interpretation of the Consent Order, 10/30/87. P. 200093-200093.
11. Letter to Mr. Edward Fox, Carter, Ledyard, & Milburn, from Mr. Martin Harrell, U.S. EPA, re: Fire safety at the plant, 12/4/87. P. 200094-200095.
12. Letter to Mr. Richard A. Penna, Schnader, Harrison, Segal & Lewis, from Mr. Martin Harrell, re: Fire safety at the plant, 12/4/87. P. 200096-200097.
13. Letter to Mr. Martin Harrell, U.S. EPA, from Mr. Edward M. Fox, Carter, Ledyard, & Milburn, re: Freedom Savings and Loan Association interest in the Publicker Site, 12/4/87. P. 200098-200099.
14. Letter to Mr. Richard Penna, Schnader, Harrison, Segal, & Lewis, from Mr. Martin Harrell, U.S. EPA, re: Response actions at the Cuyahoga Wrecking Site, 12/14/87. P. 200100-200100.
15. Letter to Mr. Edward Fox, Carter, Ledyard, & Milburn, from Mr. Martin Harrell, U.S. EPA, re: Possible undertaking of response actions at the Cuyahoga Wrecking Site, 12/14/87. P. 200101-200101.
16. Letter to Mr. Peter Bergen, Le Boeuf, Lamb, Lerby, & MacRae, from Mr. Martin Harrell, U.S. EPA, re: EPA's response actions at the site, 12/14/87. P. 200102-200102.
17. Letter to Mr. Martin Harrell, U.S. EPA, from Mr. Edward M. Fox, Carter, Ledyard, & Milburn, re: EPA's response actions at the site, 12/16/87. P. 200103-200106.
18. Letter to Mr. Martin Harrell, U.S. EPA, from Mr. G.S. Peter Bergen, Le Boeuf, Lamb, Lerby, & MacRae, re: Control access to the site, 12/18/87. P. 200107-200109. A formal response from Publicker Industries,

Inc. regarding recent letters and communication about the site is attached.

19. Letter to Mr. Richard Penna, Schnader, Harrison, Segal, & Lewis, from Mr. Martin Harrell, U.S. EPA, re: Review of the site assessment report, 1/7/88. P. 200110-200110.
20. Order, re: Cuyahoga Equipment Corporation, 2/23/88. P. 200111-200117. A Notice of Motion by Freedom Savings and Loan Association to Relinquish Control of Access to the Publicker Site and a Motion of Freedom Savings and Loan Association to Relinquish Control of Access to the Publicker Site are attached.
21. Order Setting Hearing on Trustee's Application for Approval of Option Agreement with Delaware Avenue Enterprises, Inc., Regarding Priority of Overland Corporation and Setting Procedure for Entertaining Offers, 6/9/88. P. 200118-200204.
22. Order Approving Option Agreement with Delaware Avenue Enterprises, Inc. Regarding Property of Overland Corporation, 7/19/88. P. 200205-200218. A Schedule C - Description and Recital is attached.
23. Order Granting Supplemental Approval of Option Agreement with Delaware Avenue Enterprises, Inc. Regarding Property of Overland Corporation As Against Judgement Liens and Encumbrances, 8/9/88. P. 200219-200221.
24. Stipulation, re: Cuyahoga Equipment Corporation, 9/23/88. P. 200222-200233.
25. Letter to Mr. Jeffrey B. Winegar and Mr. Harold Yates, U.S. EPA, from Mr. R. Scott McCay, Texaco, Inc., re: Comments on possible company liability, 5/1/89. P. 200224-200225.
26. Letter to Ms. Donna M. McCartney, U.S. EPA, from Ms. Lynn L. Zimmerman, Radian Corporation, re: Comments on possible company liability, 5/5/89. P. 200226-200228.
27. Letter to Chester Salomon, Cuyahoga Wrecking Company and Overland Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: 106(a) notice of possible

liability, 5/25/89. P. 200229-200231.

28. Letter to Mr. James J. Weis, Publicker Industries Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: 106(a) notice of possible liability, 5/25/89. P. 200232-200234.
29. Letter to Mr. Louis Minella, Rollins Environmental Services Delaware, Inc., from Mr. Peter W. Schaul, U.S. EPA, re: CERCLA §104(e) request for information concerning three drums found at the site, 12/16/91. P. 200235-200254. Attachment A, hazardous waste manifests and Attachment B, First Information Request are attached.
30. Letter to Ms. Frances Costanzi, U.S. EPA, from Mr. Louis A. Minella, Rollins Environmental Services (DE) Inc., re: Response to request for information pertaining to three drums found at the site, 1/6/92. P. 200255-200263. The following are attached:
 - a) a Rollins' bill of lading dated November 11, 1987;
 - b) a Rollins' scale ticket dated November 12, 1987;
 - c) a shipping invoice;
 - d) a shipping order for Rollins' Environmental Services (NJ);
 - e) a Rollins' bill of lading dated November 20, 1987;
 - f) a Rollins' scale ticket dated November 24, 1992;
 - g) a shipping order for Rollins Environmental Services (NJ);

III. REMEDIAL RESPONSE PLANNING

1. Letter to Mr. Martin Harrell, U.S. EPA, from Ms. Amy R. Doberman, Schnader, Harrison, Segal, & Lewis, re: Site assessment report, 11/2/87. P. 300001-300001.
2. Memorandum to Mr. Harry J. Cusick, City of Philadelphia, from Mr. Roger M. Ulshafer, City of Philadelphia, re: Fire Safety at the Publicker Site, 12/4/87. P. 300002-300002.
3. Letter to Mr. Jeffrey Winegar, U.S. EPA, from Mr. Jim Dych, CECOS International, re: Review of the Proposed Plans for the Proposed Remedial Actions to stabilize conditions at the Publicker Industries Site, 3/7/89. P. 300003-300003.
4. Letter to Mr. Brian Nishitani, U.S. EPA, from Mr. Barry S. Neuman, Schnader, Harrison, Segal and Lewis, re: Extending the period for submitting written comments on EPA's Proposed Remedial Action, 3/20/89. P. 300004-300006.
5. Letter to Mr. Barry S. Neuman, Schnader, Harrison, Segal and Lewis, from Mr. Brian M. Nishitani, U.S. EPA, re: Extension of the public comment period, 3/27/89. P. 300007-300007.
6. Letter to AAA Warehousing Inc. from Ms. Donna M. McCartney, U.S. EPA, re: Comments on the Proposed Plan Fact Sheet, 3/31/89. P. 300008-300010. A Publicker Industries Site mailing list is attached.
7. Letter to Mr. Barry S. Neuman, Schnader, Harrison, Segal & Lewis, from Mr. Brian M. Nishitani, U.S. EPA, re: Extension of the public comment period, 3/31/89. P. 300011-300011.
8. Letter to Ms. Donna M. McCartney, U.S. EPA, from Mr. William Askins, Atochem, Inc., re: Comments on Proposed Plan Fact Sheet, 4/19/89. P. 300012-300012.
9. Letter to Mr. Brian M. Nishitani, U.S. EPA, from Mr. Barry S. Neuman, Schnader, Harrison, Segal & Lewis, re: Request for extension of the public comment period, 4/28/89. P. 300013-300015.
10. Letter to Mr. Barry S. Neuman, Schnader, Harrison, Segal & Lewis, from Mr. Brian M. Nishitani, U.S. EPA,

re: Request for extension of the public comment period, 5/1/89. P. 300016-300016.

11. Comments of Publicker Industries Inc. Regarding Proposed Actions at Cuyahoga Wrecking Corporation Site, 3223 Delaware Avenue, Philadelphia, Pennsylvania, prepared by Mr. Barry S. Neuman and Mr. Richard A. Penna, Schnader, Harrison, Segal & Lewis, 5/19/89. P. 300017-300163. A cover letter is attached.
12. Letter to AAA Warehousing, Inc. from Mr. Jeffrey B. Winegar, U.S. EPA, re: Transmittal of list of notification letters sent, 5/26/89. P. 300164-300166. The list is attached.
13. Superfund Record of Decision: Publicker/Cuyahoga Wrecking, PA, 6/30/89. P. 300167-300227.
14. Note, re: Availability of analytical data, (no author cited), (undated). P. 300228-300228.
15. Letter to Mr. Matt Miller, PADER, from Ms. Frances Costanzi, U.S. EPA, re: Formal request for Pennsylvania Applicable or Relevant and Appropriate Requirements (ARARs), 12/8/93. P. 300229-300230.
16. Memorandum to file from Mr. Nicholas DiNardo, U.S. EPA, re: Three unidentified yellow salvage drums found on the site, 12/2/91. P. 300231-300233.
17. Proposed Plan, Publicker Industries Site, 6/95. P. 300234-300243.

IV. REMOVAL RESPONSE PROJECTS

1. U.S. EPA Pollution Report #1, Publicker Site, 6/26/87.
P. 400001-400002
2. U.S. EPA Pollution Report #2, Publicker Site, 7/1/87.
P. 400003-400004.
3. U.S. EPA Pollution Report #3, Publicker Site, 7/7/87.
P. 400005-400005.
4. Special Bulletin A from Mr. Robert E. Caron, U.S. EPA,
re: Site conditions and status, 7/9/87. P. 400006-
400007.
5. U.S. EPA Pollution Report #4, Publicker Site, 7/9/87.
P. 400008-400009.
6. U.S. EPA Pollution Report #5, Publicker Site, 7/10/87.
P. 400010-400011.
7. U.S. EPA Pollution Report #6, Publicker Site, 7/17/87.
P. 400012-400013.
8. U.S. EPA Pollution Report #7, Publicker Site, 7/22/87.
P. 400014-400015.
9. U.S. EPA Pollution Report #8, Publicker Site, 7/23/87.
P. 400016-400018.
10. U.S. EPA Pollution Report #9, Publicker Site, 7/24/87.
P. 400019-400020.
11. U.S. EPA Pollution Report #10, Publicker Site, 8/13/87.
P. 400021-400022.
12. Special Bulletin A from Mr. T. Massey, U.S. EPA, re:
Site conditions and status, 12/8/87. P. 400023-400024.
13. Special Bulletin A from Mr. T. Massey, U.S. EPA, re:
Site conditions and status, 12/8/87. P. 400025-400026.
14. U.S. EPA Pollution Report #1, Publicker Site, 12/8/87.
P. 400027-400028.
15. U.S. EPA Pollution Report #2, Publicker Site, 12/9/87.
P. 400029-400030.
16. U.S. EPA Pollution Report #3, Publicker Site, 12/9/87.

P. 400031-400032.

17. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Additional funding request for the Publicker Industries Site, 12/9/87. P. 400033-400038. A cover memorandum is attached.
18. U.S. EPA Pollution Report #4, Publicker Site, 12/9/87. P. 400039-400042.
19. U.S. EPA Pollution Report #5, Publicker Site, 12/9/87. P. 400043-400046.
20. U.S. EPA Pollution Report #6, Publicker Site, 12/10/87. P. 400047-400048.
21. U.S. EPA Pollution Report #7, Publicker Site, 12/10/87. P. 400049-400051.
22. U.S. EPA Pollution Report #11, Special Bulletin B, Publicker Site, 12/13/87. P. 400052-400055.
23. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Justification for continuation of a removal action at the Publicker Site, 3/1/88. P. 400056-400059. A memorandum regarding an Interim Additional Funding Request for the former Publicker Industries site is attached.
24. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Publicker Industries Site Two Million Exemption Continuation of Removal Activities, 3/23/88. P. 400060-400076. A memorandum regarding the request for additional funding to continue the removal actions at the Publicker Site is attached.
25. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. Timothy Fields, Jr., re: Region III's Two Million Exemption and Ceiling Increase Request for Continuation of Removal Activities for the Publicker Industries Site, 4/6/88. P. 400077-400080. A memorandum regarding Publicker Industries Site Two Million Dollar Exemption addendum is attached.
26. Report: Report Of Findings And Work Activities, Federal Removal Project, Publicker Chemical Site, Philadelphia, Pennsylvania, prepared by B.E.S. Environmental Specialists, Inc., 7/14/88. P. 400081-

400096.

27. Report: Report of Findings and Work Activities, Federal Removal Project, Publicker Chemical Site, Philadelphia, Pennsylvania, prepared by B.E.S. Environmental Specialists, Inc., 7/14/88. P. 400097-400115.
28. Memorandum to Mr. James M. Seif, U.S. EPA, from Ms. Lisa Marie Price, U.S. EPA, re: Request for 12-Month Exemption for the Publicker Industries Site, 11/17/88. P. 400116-400121.
29. Letter to Mr. Jeffrey B. Winegar, U.S. EPA, from Mr. Barry S. Neuman, Schnader, Harrison, Segal & Lewis, re: Cost estimates regarding on-site biological treatment, 5/30/89. P. 400122-400125. A letter detailing the costs is attached.
30. Publicker Industries Site, Scope of Work, (no author cited), (undated). P. 400126-400131.
31. Excerpts from the Publicker Industries Site Federal On-Scene Coordinator's Report, (no author cited), (undated). P. 400132-400136.
32. Report: Preliminary Operations Plans, (no author cited), (undated). P. 400137-400140.
33. Report: Publicker Industries Site Original Tank Assessment, (no author cited), (undated). P. 400141-400165.
34. Handwritten letter to Marty [sic] from Mr. Dennis Matlock, Weston, Inc., re: Transmittal of information regarding the four bulk storage tanks, (undated). P. 400166-400201. A handwritten memorandum detailing the tank information is attached.
35. Report: Estimated Cost Summary, Publicker Industries, Site Stabilization Operable Unit, prepared by Mr. Jeff Winegar, U.S. EPA, (undated). P. 400202-400206.
36. U.S. EPA Federal On-Scene Coordinator's Report, Publicker Industries Site, 12/8/87-12/14/91. P. 400207-400481.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. Handwritten meeting attendance sheet, 7/14/87. Three business cards, a handwritten list of RP contacts, and a handwritten attendance list of the August 7, 1987 Publicker meeting are attached. P. 500001-500011.
2. Newspaper article entitled "EPA Probes Old S. Phila. Distillery," Philadelphia Daily News, 7/24/87. P. 500012-500012.
3. Press release from the United States Attorney for the District of Maryland, 11/5/87. P. 500013-500016.
4. Press release from the U.S. Department of Justice, 11/6/87. A document entitled "In the United States District Court for the Eastern District of Pennsylvania, United States of America v. Publicker Industries, Information Count One" is attached. P. 500017-500019.
5. Press release from the U.S. EPA Environmental News entitled "EPA Takes Over Cuyahoga Wrecking Site Clean-Up," 12/15/87. P. 500020-500021.
6. Newspaper article entitled "Firefighters Stem Publicker Leak," Philadelphia Daily News, 1/15/88. P. 500022-500022.
7. Press release from the U.S. EPA Environmental News entitled "EPA Seeks Comments on Proposed Interim Remedial Actions to Stabilize Conditions at the Publicker Site," 2/27/89. P. 500023-500025.
8. Superfund Program Fact Sheet: Publicker Site, City of Philadelphia, Pennsylvania, Proposed Plan, prepared by U.S. EPA Region III, 3/89. P. 500026-500030.
9. U.S. EPA Public Notice, Publicker Site, 3/1/89. P. 500031-500031.
10. Handwritten Publicker Superfund Meeting Attendance List, 3/15/89. P. 500032-500032.
11. Transcript of Public Meeting, 3/15/89. P. 500033-500087.
12. Letter to U.S. EPA from Mr. Barry S. Neuman, Schnader, Harrison, Segal and Lewis, re: FOIA request, 3/21/89.

P. 500088-500095. A transmittal sheet and the Superfund Program Fact Sheet Proposed Plan are attached.

13. Letter to Mr. Barry S. Neuman, Schnader, Harrison, Segal & Lewis, from Mr. Brian M. Nishitani, U.S. EPA, re: Response to FOIA request, 3/31/89. P. 500096-500096.
14. Newspaper article entitled "EPA Team Cleaning Up Solvent Leak," The Philadelphia Inquirer, (undated). P. 500097-500097.

SITE SPECIFIC GUIDANCE DOCUMENTS

1. Memorandum to Addressees from Mr. Hans J. Crump, U.S. EPA, re: Draft Asbestos Report, 6/20/88.
2. Memorandum to Mr. David P. Wright, U.S. EPA, and Ms. Lisa Marie Price, U.S. EPA, from Ms. Sella M. Burchette, U.S. EPA, re: Asbestos at the site, 7/15/88.
3. A list of General Guidance Documents, U.S. EPA, (undated).